



## Department of Energy

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U. S. Environmental Protection Agency, Region VIII  
ATTN: Rocky Flats Project Manager, 8HWM-RI  
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Denver, Colorado 80202-2405

1139-DOE-91

Mr. Gary Baughman  
Hazardous Waste Facilities Unit Manager  
Colorado Department of Health  
4210 East 11th Avenue  
Denver, Colorado 80220

Gentlemen:

As agreed to in the February 7, 1991 IAG Project Coordinator meeting and discussed in our February 8, 1991 letter, we are transmitting an Interim Plan for the Prevention of Contaminant Dispersion (PPCD) until such time that we can finalize the PPCD. We are submitting this Interim PPCD pursuant to the Environmental Restoration Federal Facility Agreement and Consent Order (known as the Environmental Restoration InterAgency Agreement, IAG) which specifies submittal by February 21, 1991.

The Interim PPCD references project-specific Health and Safety Plan actions to prevent contaminant dispersion and will be used to cover field activities until the time that the Final PPCD is approved.

As discussed in the February 7, 1991 staff-level meeting, the scope of the Final Proposed PPCD will include plans for: (1) the 16 Operable Unit (OU) remedial investigations, (2) off-site receptors, (3) major risk of compounds at each OU, and (4) major action levels for remedial investigation activities (drilling, excavation, soils movement, vehicular traffic, etc.) and be submitted July 22, 1991. This date is a revision of the April 18, 1991 date requested in our February 8, 1991 letter. Accordingly, pursuant to Parts 32 (Additional Work or Modifications to Work) and 42 (Extensions), we are requesting a revised (from the February 8, 1991 request) extension of submittal of the Final Proposed PPCD (currently scheduled for February 21, 1991) and the Responsiveness Summary (scheduled for June 26, 1991). We request extension dates of July 22, 1991 and November 18, 1991, respectively.

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ADMIN RECORD

Mr. Hestmark  
Mr. Baughman  
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The justification for the extension is the need to modify the PPCD and perform additional work, based upon your comments and in discussions in working meetings.

Please contact Scott Grace of my staff at 966-7199 if you have further questions on this request.

Sincerely,

David P. Simonson  
Assistant Manager  
for Environmental Management

Enclosure

cc  
E. Evered, EG&G/RF  
T. Greengard, EG&G/RF  
D. Smith, EG&G/RF  
B. Frazer, EPA  
J. Schieffelin, CDH

## INTERIM-PLAN FOR PREVENTION OF CONTAMINANT DISPERSION

### 1 ) OBJECTIVE

The objective of this Interim-Plan for Prevention of Contaminant Dispersion (I-PPCD) is to establish procedural requirements to mitigate potential hazards, on an interim basis, to persons located offsite as a result of contact with emissions resulting from intrusive remedial investigation activities.

### 2) SCOPE

Procedural requirements identified herein are applicable to certain intrusive actions taken at the 16 Operable Units (UO's) as part of the RFI/RI activities described in the Inter Agency Agreement (IAG). Intrusive activities which fall within the scope of this I-PPCD are those with the potential for producing appreciable quantities of suspended particulate, primarily through mechanical actions. Intrusive activities potentially susceptible to producing appreciable quantities of suspended particulate include:

- Monitoring well and soil/rock borehole installation
- Excavations such as trenching and test-pitting using powered equipment

Additionally, heavy vehicular traffic associated with intrusive RFI/RI activities shall be considered susceptible to producing appreciable quantities of suspended particulate. By contrast, activities such as surface soil sampling with hand implements are not considered susceptible to producing appreciable quantities of suspended particulate.

Procedural requirements identified herein must be evaluated on a case-by-case basis to determine their potential impact on other IAG objectives. For example, it is possible that applying certain dispersion techniques, such as wetting, could compromise sample integrity and limit the usefulness of the data for which the sampling was intended.

The procedural requirements identified in the I-PPCD shall remain in effect until the final PPCD is approved or until modifications are substantiated, approved, and documented in the Site Specific Health and Safety Plan (SSH&SP).

### 3) RESPONSIBILITY

The EG&G RFI/RI Project Manager (PM) shall be responsible for assuring that activities conducted at his/her OU are performed in accordance with the requirements identified herein.

The Remedial Projects Division (RPD) Manager will be responsible for follow-up and auditing the PM.

## 4 ) PROCEDURAL REQUIREMENTS

A pre-startup activity review shall be conducted by the PM and the Activity Field Supervisor to evaluate the potential for particulate emissions to create hazardous conditions. If the activity is being performed by non-EG&G personnel, the subcontractor's Activity Field Supervisor shall participate in the review.

The pre-startup activity review involving intrusive activities where there is a significant potential for producing appreciable quantities of suspended particulate shall be documented by completion of a Radiological/H&S Work Permit (HSP 6.05) and an Excavation Permit (HSP 6.01). HSP's 6.05 and 6.01 are attached.

If the review establishes that there is a significant potential for producing appreciable quantities of suspended particulate that could create hazardous conditions, the specific procedural requirements identified below shall govern the activity.

### 4.1 SPECIFIC REQUIREMENTS

Activities where there is a significant potential for producing appreciable quantities of suspended particulate shall not be conducted when the following conditions exist:

- Sustained wind speeds above 15 miles per hour (mph) as measured by a site-located anemometer. Sustained winds above 15 mph exist when the 15-minute average wind-speed exceeds 15 mph for two consecutive 15-minute periods.
- Soils moisture content less than 15% on roadways adjacent to the activity area as measured with a Soiltest "Speedy Moisture Tester" or equivalent instrument. Soils can be wetted to increase the moisture content to 15% if necessary.
- In the special case of excavations, the top 6" of soil will be moved (i.e., scraped) and placed in a low pile and covered with a tarp or other suitable covering to prevent resuspension of particulates. The width of the scraped zone shall be wide enough to accommodate the expected volume of soil from the excavation, without coming into contact with unexcavated adjacent surface soil.

Air quality monitoring requirements for activities where there is a significant potential for producing appreciable quantities of suspended particulate include the following:

- Site perimeter and community Radiological Ambient Air Monitoring Program (RAAMP) monitoring.
- Local monitoring of Respirable Suspended Particulate (RSP) at individual activity worksites shall be conducted using a TSI "Piezobalance" Model 3500 Respirable Aerosol Mass Monitor, real-time instrument. Local RSP measurements will be used to guide the PM's evaluation of the potential hazards associated with activity related emissions. The threshold RSP concentration for curtailing intrusive activities will be 6.0 milligrams/cubic meter (mg/m<sup>3</sup>). "

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- Additional worker health and safety monitoring as required by the SSH&SP.

Additional requirements that govern activities where there is a significant potential for producing appreciable quantities of suspended particulate that could create hazardous conditions include the following:

- Excavated soils that are not promptly backfilled shall be covered with a tarp or similar cover to prevent resuspension of particulates.
- Vehicular traffic will be minimized to the extent practicable.
- Vehicular traffic shall not exceed 5 mph.
- Roadways will be watered as necessary.

Activity specific requirements will be evaluated periodically to determine their effectiveness at preventing dispersion of contaminants. Modifications to these requirements will be documented in the SSH&SP.

DATE: February 15, 1991

TO: Scott Grace, DOE/RFO, T130A, X7199

FROM: Dennis Smith, EG&G/EMAD, T130B, X5958

SUBJECT: Interim-Plan for Prevention of Contamiant of Contaminant  
Dispersion (I-PPCD)

This informal communique transmits a draft of the I-PPCD, as we discussed, for DOE's internal use. A formal transmittal of the final is forthcoming. The final I-PPCD will include copies of HSP 6.01 and 6.05 to be included as attachments.

cc T.C. Greengard  
M.B. Arndt